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12 UNITED STATES DISTRICT COURT  
13 EASTERN DISTRICT OF WASHINGTON

14 UNITED STATES OF AMERICA,

15  
16 Plaintiff,

17 v.  
18

19 RONALD CRAIG ILG,

20 Defendant.  
21

Case No. 2:21-cr-00049-WFN

**REPLY DECLARATION OF  
ANDREW M. WAGLEY IN  
SUPPORT OF DEFENDANT'S  
PRETRIAL MOTIONS**

22  
23 I, Andrew M. Wagley, do hereby declare the following is true and correct  
24 to the best of my knowledge:  
25

- 26 1. I am an attorney of record for the Defendant, Ronald C. Ilg, MD  
27  
28 ("Dr. Ilg"), in this matter. I make this Declaration in support of  
29  
30 Defendant's Reply briefing filed contemporaneously herewith.  
31  
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- 1           2.     The Exhibits pagination herein is continued from the original  
2  
3                 Exhibits pagination contained in ECF No. 98. As such, the Exhibits  
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5                 herein begin with Exhibit F.
- 6           3.     Attached hereto as **Exhibit F** are true and correct copies of pleadings  
7  
8                 from the divorce proceedings between Dr. Ilg and Victim 2. These  
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10                documents are contained within the public Court File located at the  
11  
12                Spokane County Superior Court Clerk's Office.
- 13          4.     Attached hereto as **Exhibit G** is a true and correct copy of a  
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15                statement authored by Dr. Ilg's former nanny. This statement was  
16  
17                propounded by the Government in discovery herein. As indicated in  
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19                the Coinbase Search Warrant Application, "VICTIM 2 provided the  
20                FBI with a statement and supporting text messages from a person  
21  
22                VICTIM 2 identified as a nanny that VICTIM 2 and RONALD  
23                CRAIG ILG hired to care for their son." (ECF No. 98-1 at 34.)
- 24          5.     Attached hereto as **Exhibit H** is a true and correct copy of a  
25  
26                photograph taken during the search of Dr. Ilg's residence and  
27  
28                propounded by the Government in discovery herein.
- 29          6.     Attached hereto as **Exhibit I** are true and correct copies of the  
30  
31                Search and Seizure Warrant for Ronald Craig Ilg, as well as the  
32

1 Search and Seizure Warrant for the Smartphone Belonging to Ronald  
2 Craig Ilg. These documents were propounded by the Government  
3 during discovery herein.  
4

5  
6 7. Attached hereto as **Exhibit J** is a true and correct copy of the Search  
7 and Seizure Warrant for Witness 1, which was propounded by the  
8 Government during discovery herein.  
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10  
11 8. Pursuant to Fed. R. Civ. P. 5.2, Fed. R. Crim. P. 49.1, and Eastern  
12 District of Washington ECF filing requirements, my office has  
13 redacted the social security numbers, dates of birth, and names of  
14 minor children.  
15  
16

17  
18 I hereby declare the foregoing is true and correct under penalty of perjury  
19 of the laws of the State of Washington and United States of America.  
20

21 EXECUTED this 2nd day of June, 2022 in Spokane, Washington.  
22

23  
24 By: /s/ Andrew M. Wagley  
25 Andrew M. Wagley  
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**CERTIFICATE OF SERVICE**

I hereby certify that on June 2, 2022, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to all attorneys of record in this matter.

EXECUTED this 2nd day of June, 2022 in Spokane, Washington.

By: /s/ Andrew M. Wagley  
Andrew M. Wagley